



**Joint Committee on Consumer Protection and Professional Licensure**  
**Testimony of Beth Keeley, Chief, Human Trafficking Division**  
**S. 168, *An Act regulating bodyworks***  
**Monday, October 28, 2019**  
***As Prepared for Delivery***

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Good morning, Chairman Feeney, Chairman Chan, and members of the Joint Committee. Thank you for the opportunity to testify before you today. My name is Beth Keeley, and I am Chief of the Human Trafficking Division in the Attorney General's Office. With me today is our Chief of Policy and Government, Alicia Rebello-Pradas. The Attorney General could not be here today – she has a longstanding commitment in a different part of the state – but she asked that we attend today's hearing to express her strong support for S. 168, *An Act regulating bodyworks*, a bill that the office drafted with Senator Montigny and the Department of Professional Licensure, and has the support of DPL and the Administration.

On behalf of AG Healey, we want to thank Senator Montigny for his tireless work on this critical issue and for sponsoring this legislation. We also would like to thank his incredible staff, as well as DPL for their partnership. The Attorney General has made combatting human trafficking a top priority.

Under AG Healey's leadership, our Human Trafficking Division handles high impact, multi-jurisdictional human trafficking investigations and prosecutions, and focuses on policy, training and prevention efforts across our state. Since 2012, our team has investigated and prosecuted numerous organized criminal enterprises, including indictments of more than 10 individuals who have set up illicit massage or bodywork establishments as fronts for human trafficking.

For example, after a months-long investigation by our office and local and federal law enforcement agencies, a Quincy woman was indicted for trafficking women at illicit bodywork establishments in East Longmeadow, Hadley and Framingham, Massachusetts. This past September, she pled guilty to those indictments and was sentenced to five years in prison. This trafficker filed certificates with the state to establish her so-called businesses as a legitimate bodywork establishments. In reality, she recruited women, advertised sexual services online, and set up appointments for the victims to exchange commercial sex for money. Meanwhile, the victims lived at the business locations and were dependent on the trafficker for transportation, groceries, and other necessities.

Another example is a recent case that went to trial last December. A Medford woman was convicted of multiple counts of sex trafficking for operating six illicit bodywork and wellness

businesses that were in fact fronts for an extensive human trafficking operation. Through these illicit businesses, this trafficker offered sexual activity between women and clients in exchange for a fee. This case was another example of what we frequently see: coordinated recruitment of women from across the eastern seaboard, including New York; advertised sexual services on websites known to facilitate prostitution; and setting up appointments for sexual encounters for the women. This is lucrative for the traffickers, who manage the financial aspects of the organization and are able to avoid detection by establishing purportedly valid bodywork practices.

We see so many of these cases because, for traffickers, it is a low risk proposition: set up shop with the cloak of a legitimate industry and escape the regulation and review that would result in law enforcement oversight and action. These fronts for sex trafficking have popped up in communities across Massachusetts. Closing the loophole in the current massage therapy law that exempts bodywork establishments and practitioners from state oversight will help minimize a major opportunity for sex traffickers. The loophole gives traffickers the cover to advertise as bodywork establishments while they oppress victims, elude licensing requirements that currently apply to the massage therapy industry, and evade the detection of law enforcement.

Unlike in the massage context, we in law enforcement have to wait until we receive a call that something “just isn’t right” before we can investigate a bodywork location. As a result, we are seeing municipalities take on this issue on the local level, creating a patchwork of different standards for legitimate practitioners to navigate. This legislation, if passed, would provide universal standards and oversight, **but** with critical differences to address the various healing practices. It would accommodate, for example, the variations in education, training, and certification standards that are already in place.

The goal of this legislation is to provide DPL and law enforcement the tools we need to shut down traffickers masquerading as bodywork businesses and to help support legitimate law-abiding practitioners. While we want to ensure that we can combat human trafficking however it manifests in our communities, we do not want to burden legitimate practitioners with arduous training and education requirements or redefine industry standards for their modalities.

We understand the importance of proactively engaging practitioners in conversation to ensure that the intent of the legislation is achieved while their ability to practice in Massachusetts is protected. To date, we have met numerous times with practitioners, local and national associations and other interested stakeholders in the bodywork and massage therapy industries and are actively working with Senator Montigny to refine the legislation and mitigate any remaining concerns.

We intend to submit a redraft that addresses many of the concerns we have heard over the last few months and will remain open to making further changes to better reflect current industry practices. Once we submit a redraft, we urge the Committee to report the bill out favorably. As always, we look forward to working with you and your staff on this important legislation and are happy to answer any questions you may have.

Thank you again for the opportunity to testify today.